

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

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*PROPOSED ATTORNEYS FOR DEBTOR*

In re:

LTL MANAGEMENT LLC,<sup>1</sup>

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

**FIRST SUPPLEMENTAL CERTIFICATION OF JOHN R. CASTELLANO IN SUPPORT OF  
APPLICATION FOR RETENTION OF ALIXPARTNERS, LLP AS FINANCIAL ADVISOR FOR  
THE DEBTOR EFFECTIVE AS OF THE PETITION DATE**

I, JOHN R. CASTELLANO, being of full age, certify as follows:

1. I am a partner and managing director of AlixPartners.
2. Except as otherwise noted, I have personal knowledge of the matters set forth herein and,

if called as a witness, would testify competently thereto.

<sup>1</sup>

The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

3. I submit this supplemental declaration in the case of the above-captioned debtor (the “Debtor”) to supplement the disclosures set forth in my original declaration dated May 4, 2023 [ECF No. 429] (the “Original Declaration”).<sup>2</sup>

4. Unless otherwise noted, references to AP below collectively refer to AlixPartners, AP Holdings and each of their respective subsidiaries. AlixPartners would like to disclose the following:

- As set forth in the Original Declaration, AP follows a practice to solicit from the members of its Boards their connections to the Parties in Interest List independent of AP. In response, the Institutional Investors have offered the following disclosures of their respective connections to the Investor Search Parties:
  - CDPQ: no investment in any Investor Search Parties.
  - Investcorp: no investments in any Investor Search Parties.
  - PSP: no investment in any Investor Search Parties.
- AP follows a practice to solicit from the members of its Boards their connections to the parties in interest independent of AP. In response, one or more of the members of its Boards have offered the following disclosures:
  - Hogan Lovells US LLP, a professional to the Debtor, is a current or former legal services provider to an AP investor or one of its affiliates.
- Blake Cassels & Graydon LLP (“Blake”), a professional to the Debtor, is a professional and counsel to current and former AP clients in matters unrelated to the Debtor. Blake is a former AP client in matters unrelated to the Debtor. Blake is a vendor to AP.
- Epiq Corporate Restructuring LLC, a claims agent to the Debtor, and affiliates (“Epiq”) are litigation parties and professionals to current and former AP clients in matters unrelated to the Debtor. Epiq is a former AP client in matters unrelated to the Debtor. Epiq is a former employer of current AP employees.
- Hogan Lovells LLP (“Hogan”), a professional to the Debtor, is a professional, counsel, and opposing counsel to current and former AP clients in matters unrelated to the Debtor. Hogan is a current and former AP client in matters unrelated to the Debtor. Hogan is a former employer of current AP employees. Hogan is a current legal services provider to AP.
- James L. Patton, a key party in *Imerys Talc America, Inc.* and *Cyprus Mines Corp.*, is a partner in the law firm of Young Conaway Stargatt & Taylor LLP (“YCST”). YCST is a professional, counsel, and opposing counsel to current and former AP clients in matters unrelated to the Debtor. YCST is a legal services provider to AP.
- Janssen Biologics (Ireland) Limited, Janssen Biologics B.V., Janssen BioPharma, LLC, Janssen Biotech, Inc., Janssen Cilag Farmaceutica S.A., Janssen Cilag S.p.A., Janssen Cilag SPA, Janssen

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<sup>2</sup> Capitalized terms used herein but not defined shall have the meaning given to such terms in the Original Declaration.

Cilag, C.A., Janssen Development Finance Unlimited Company, Janssen Egypt LLC, Janssen Farmaceutica Portugal Lda, Janssen France Treasury Unlimited Company, Janssen Global Services, LLC, Janssen Holding GmbH, Janssen Inc., Janssen Irish Finance Unlimited Company, Janssen Japan Treasury Unlimited Company, Janssen Korea Ltd., Janssen Mexico Treasury Unlimited Company, Janssen Oncology, Inc., Janssen Ortho LLC, Janssen Pharmaceutica (Proprietary) Limited, Janssen Pharmaceutica NV, Janssen Pharmaceutica S.A., Janssen Pharmaceutical K.K., Janssen Pharmaceutical Sciences Unlimited Company, Janssen Pharmaceutical Unlimited Company, Janssen Pharmaceuticals, Inc., Janssen Products, LP, Janssen R&D Ireland Unlimited Company, Janssen Research & Development, LLC, Janssen Sciences Ireland Unlimited Company, Janssen Scientific Affairs, LLC, Janssen Supply Group, LLC, Janssen Vaccines & Prevention B.V., Janssen Vaccines Corp., Janssen-Cilag, Janssen-Cilag (New Zealand) Limited, Janssen-Cilag A/S, Janssen-Cilag AG, Janssen-Cilag Aktiebolag, Janssen-Cilag AS, Janssen-Cilag B.V., Janssen-Cilag d.o.o. Beograd, Janssen-Cilag de Mexico S. de R.L. de C.V., Janssen-Cilag Farmaceutica Lda., Janssen-Cilag Farmaceutica Ltda., Janssen-Cilag GmbH, Janssen-Cilag International NV, Janssen-Cilag Kft., Janssen-Cilag Limited, Janssen-Cilag Manufacturing, LLC, Janssen-Cilag NV, Janssen-Cilag OY, Janssen-Cilag Pharma GmbH, Janssen-Cilag Pharmaceutical S.A.C.I., Janssen-Cilag Polska, Sp. z o.o., Janssen-Cilag Pty Ltd, Janssen-Cilag S.A., Janssen-Cilag s.r.o., Janssen-Cilag, S.A., Janssen-Cilag, S.A. de C.V., Janssen-Pharma, S.L., non-debtor affiliates to the Debtor, and affiliates, are litigation parties and adverse litigation parties to current and former AP clients in matters unrelated to the Debtor.

- Johnson & Johnson Medical (China) Ltd. is a current AP client in matters wholly unrelated to this Chapter 11 Case. In the time between the filing of the Original Declaration and the filing of this supplemental declaration, an AlixPartners subsidiary, AlixPartners (Shanghai) Business Advisory Services Limited, was retained by Johnson & Johnson Medical (China) Ltd. to provide internal investigative support services (the “J&J China Engagement”). While the J&J China Engagement is unrelated to the services AP is providing to the Debtor, out of an abundance of caution, AP has implemented an information barrier between the AP team working on the J&J China Engagement and the AP team providing services to the Debtor.
- Jones Day, a professional to the Debtor, is a professional, counsel, and opposing counsel to current and former AP clients in matters unrelated to the Debtor. Jones Day is a current and former AP client in matters unrelated to the Debtor. Jones Day is a legal services provider to AP.
- King & Spalding (“K&S”), a professional to the Debtor, is a professional and counsel to current and former AP clients in matters unrelated to the Debtor. K&S is a current and former AP client in matters unrelated to the Debtor.
- McNeil AB, McNeil Consumer Pharmaceuticals Co., McNeil Denmark ApS, McNeil Healthcare (Ireland) Limited, McNeil Healthcare (UK) Limited, McNeil Healthcare LLC, McNeil Iberica S.L.U., McNeil LA LLC, McNEIL MMP, LLC, McNeil Nutritionals, LLC, McNeil Panama, LLC, McNeil Products Limited, and McNeil Sweden AB, non-debtor affiliates to the Debtor, and affiliates, are litigation parties and adverse litigation parties to current and former AP clients in matters unrelated to the Debtor.
- Prudential Reinsurance Company, an insurance provider to the Debtor, and affiliates (“Prudential”) are bondholders, litigation parties, adverse litigation parties, lenders, lessors, lienholders, and professionals to current and former AP clients in matters unrelated to the Debtor. Prudential is a current AP client in matters unrelated to the Debtor. Prudential is a vendor to AP.

I certify under penalty of perjury that the above information is true.

Date: May 24, 2023

/s/ **John R. Castellano**  
John R. Castellano